

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE
2013 AUG 23 P 1:58
U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA

V.

DOCKET NO. 12-10226-DJC

JOHN KOSTA

ASSENTED TO MOTION FOR EXTENSION OF TIME
FOR FILING OF MEMORANDUM

Now comes the accused, John Kosta, by and through his counsel, and moves this Honorable Court to authorize an extension of time for the filing of a memorandum in support of his request for a "Franks" evidentiary hearing regarding his previously filed Motion To Suppress Evidence Seized Pursuant to a Search Warrant.

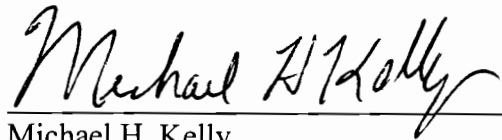
In support of this Motion, the accused states as follows:

1. On July 8, 2013, this Court set a deadline of August 23, 2013 for the filing of a memorandum in support of a "Franks" hearing.
2. Counsel filed his appearance to represent the accused on July 8, 2013, and appeared before the Court for the first time on that date.
3. Counsel was provided with a large amount of discovery material pertaining to this matter and is still in the process of reviewing these materials.
4. Due to the volume of materials counsel has had to review, along with counsel's previously scheduled court obligations, counsel has not had sufficient time to prepare and draft the aforesaid memorandum for filing by the August 23, 2013 deadline.
5. Counsel is requesting an extension of time to September 13, 2013 for the filing of the said memorandum.

6. The Government has no objection to this extension of time for filing.

WHEREFORE, the accused respectfully requests that this Court authorize the time of filing of the aforesaid memorandum to be extended to September 13, 2013.

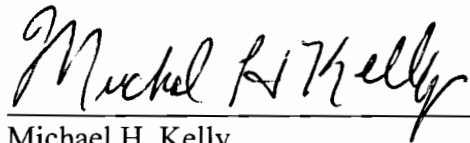
Respectfully submitted,
John Kosta
By his attorney,

A handwritten signature in black ink, reading "Michael H. Kelly", written over a horizontal line.

Michael H. Kelly
BBO# 266850
366 Broadway
Everett, MA 02149
617-387-6380

CERTIFICATE OF SERVICE

I, Michael H. Kelly, do hereby certify that on this 21st day of August, 2013, a copy of this Motion For Extension of Time For Filing of Memorandum was e-mailed to United States Attorney Leah B. Foley and to all parties of record, and mailed, postage prepaid to John Kosta.

A handwritten signature in black ink, reading "Michael H. Kelly", written over a horizontal line.

Michael H. Kelly